



Improving the Quality of Hazardous Waste Report Data



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■ Types of Checks

- General ones that apply to all forms.
- Form-specific
- Database queries after all reports are entered.
- Compliance assurance.



■ General Checks to Remember

- Required fields can't be blank.
- Fields should have acceptable values, particularly if nationally defined.
- Does the reported value make contextual sense?



■ Checks by Form Type

- Site ID Form when used as part of the Biennial Report.
- Form GM
- Form WR (some checks same as GM)
- Form OI

Site ID Form

- Generator status issues
 - Federal definitions versus state-defined complicates checks of status versus quantity generated. Need both if your state is different.
 - Generators are to check the box for the current status, which may not reflect the reason they filed the report (one-time or episodic LQG). States have to implement population of the “Include in National Report” flag.

■ Site ID Form, continued

- Status checks based on federal definitions:
 - “Include in National Report” LQG: Total gen has to be more than 2200 lbs or > 2.2 lbs of acute waste.
 - SQG: Total gen should be >220 lbs but less than 13.2 tons (2200 lbs x 12 months).
 - CESQG: Total should be less than 2640 lbs.
 - Non-gen: Qty gen in current yr should be 0 but they may have shipment data.



■ Site ID Form, continued

- Compare facility name, address, and activity info against the most recent notification and see how they correspond.
- You may need to contact the facility for clarification or to ask for a subsequent notification, depending on the Reason For Submittal values.



Form GM

- Did the site check “TSD” on the Site ID form if they have on-site mgmt that requires a permit?
- Compare shipment mgmt method codes against what you know about the receiver (use Ohio’s National TSD List).
- If the receiver was in your state, cross-check the WR data for that customer.

■ Form GM, continued

- Is the receiving facility ID a valid one and it is actually a receiver (vs transporter only)?
- Does the Source Code make contextual sense when compared to the description and Form Code?
- Was the mgmt method code listed for G25/residuals?
- Does each page have a unique number?

■ Form GM, continued

- Does the Form Code reasonably match the waste description? Examples:
 - Acute lab packs = W004
 - Batteries = W309
- Is there at least one waste code and are they all valid?
- Is every receiver on the GM listed on the OI?

■ Form GM, continued

- Is the lbs/gal density or sg within an acceptable range? Suggested flags are:
 - Lbs/gal Density <4 or >15
 - SG >4
- If the facility is a commercial TSD, did they report any waste generation?

■ Form OI

- Is each handler's ID a valid one?
- Does each handler have a type checked and does it correspond with what you know?
Some receivers are listed as transporters in error.
- Does each page have a unique number?

■ Form OI, continued

- Are any of the ID entries duplicated on the form, once as a receiver and once as a transporter?
- Is every receiver listed on one or more GMs?
- Is there at least one transporter if the site reported shipments?



Form WR

- Received quantity can't be zero.
- At least one valid waste code has to be reported.
- Page number has to be unique.
- Is the lbs/gal density or sg within an acceptable range?

■ Form WR, continued

- Customer ID must begin with a valid state postal code or FC.
- Does the customer ID pass the check-digit test if not an ID issued outside of RCRAInfo?
- Does the name/address match RCRAInfo?

■ Database Queries after Entry

- Compare total gen and total shipped for each respondent. Investigate discrepancies and use your knowledge of the site.
- Top X Generators. Print a list in descending order and review them. If submitted on paper, compare original vs keyed data.
- Compare multi-year gen and ship totals by site and look for suspicious variances.

■ Database Queries, continued

- Review top X customers at each commercial TSD and verify the receipt quantities if submitted on paper.
- Look for errors you missed the first time around. Examples:
 - Form Code = W004 but no acute waste codes.
 - Summarize TSD mgmt methods and look for mistakes.

■ Compliance Assurance

- Did all the LQGs file that you expected to? Compare against mailing list and/or Notification data.
- Use a “reverse search” to sum statewide WR data by customer ID and find sites that shipped >13.2 tons but didn't file a report.

■ Compliance Assurance, cont.

- At mass mailing time, get a list of all new notifiers who were LQGs and mail them reporting materials without them asking for it.

Report Examples and Demonstration

- Two report examples are attached to your handout:
 - 1. Ohio's Respondent List
 - 2. Ohio's "Condensed" Report printout
- DEMO